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10 United States of America

11 IN THE UNITED STATES DISTRICT COURT

12 EASTERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 CASE NO. 1:23-CR-00172-NODJ-BAM

15 Plaintiff,

16 STIPULATION AND ORDER TO CONTINUE
17 STATUS CONFERENCE

18 v.

19 KHALID GLADNEY

20 Defendant.

21 IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney and
22 Robert L. Veneman-Hughes, Assistant U.S. Attorney and Serita Rios, attorney for defendant Khalid
23 Gladney, that the status conference set for June 26, 2024 at 1:00 pm before the Honorable Barbara A.
24 McAuliffe be continued to August 28, 2024 at 1:00 p.m.

25 **STIPULATION**

26 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
27 through defendant's counsel of record, hereby stipulate as follows:

28 1. The parties need additional time to further investigate/explore matters related to resolving
the case or setting a trial date.

2. By this stipulation, defendant now moves to continue the status conference, and to
exclude time from June 26, 2024 to August 28, 2024.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case
includes investigative reports, and related documents, photographs, etc., in electronic form. All

of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

- b) Defense counsel requires additional time to review discovery and investigate.
- c) The government does not object to the continuance.
- d) Based on the above-stated findings, the ends of justice served by continuing the trial date prescribed by the Speedy Trial Act. requested outweigh the interest of the public and the defendant in a trial within the
- e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, within which trial must commence, the time period of June 26, 2024 to August 28, 2024, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and 18 U.S.C. (h)(7)(B)(iv) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action weigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Dated: June 20, 2024

Respectfully submitted,

PHILLIP A. TALBERT
United States Attorney

By /s/ ROBERT L. VENEMAN-HUGHES
ROBERT L. VENEMAN-HUGHES
Assistant United States Attorney

Dated: June 20, 2024

/s/ SERITA RIOS
SERITA RIOS
Attorney for Khalid GLADNEY

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ORDER

IT IS SO ORDERED that the status conference is continued from June 26, 2024, to **August 28, 2024**, at **1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: June 20, 2024

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE